

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : No. 1:23-bk-00988-HWV  
UPTOWN PARTNERS, LP d/b/a :  
RESIDENCES AT GOVERNOR'S : Chapter 11  
SQUARE, a/k/a GOVERNOR'S :  
SQUARE APARTMENTS :  
: :  
Debtor :  
  
UPTOWN PARTNERS, LP :  
Movant :  
: :  
v. :  
: :  
REDEVELOPMENT AUTHORITY :  
OF THE CITY OF HARRISBURG, :  
CAPITAL REGION WATER, CITY :  
OF HARRISBURG, DAUPHIN :  
COUNTY TAX CLAIM BUREAU :  
and HARRISBURG AREA SCHOOL :  
DISTRICT :  
Respondents :

**MOTION OF UPTOWN PARTNERS, LP TO CONTINUE  
FINAL SALE HEARING AND HEARING ON THE MOTION  
TO APPROVE AUCTION PURCHASER**

Uptown Partners, LP, d/b/a Residences at Governor's Square, a/k/a Governor's Square Apartments ("Debtor" or "Uptown Partners") by and through its counsel, Cunningham, Chernicoff & Warshawsky, P.C., files this Motion to Continue Final Sale Hearing and the hearing on the Motion to Approve Auction Purchaser, is as follows:

1. On May 2, 2023, the Debtor filed a voluntary Chapter 7 Petition under the United States Bankruptcy Code.

2. Following a Motion filed by the Debtor, on September 12, 2023, the Court entered an Order converting the case to a case under Chapter 11 of the United States Bankruptcy Code.

3. On November 1, 2023, the Debtor filed a Motion to Set Sale Procedures and to Approve Sale of Real Property Free and Clear of all Liens, Claims, Encumbrances and Other Interests (the “Sale Motion”) [Doc 79].

4. The Sale Motion concerns certain Real Property (the “Real Property”) located in the City of Harrisburg, Dauphin County, Pennsylvania, which contains multiple parcels of real estate on which various low-income housing is constructed.

5. On November 14, 2023, the Court entered an Order approving Debtor’s sale procedures and setting a final hearing (the “Procedures Order”) [Doc 88].

6. On January 17, 2024, the Debtor filed a Motion to Approve Auction Purchaser (the “Approval Motion”) [Doc 106], setting forth ANCDI as the Successful Bidder (as defined in the Approval Motion) and 2087 Market Street, LLC as the backup bidder.

7. Currently, the Final Hearing on the Sale Motion and the hearing on the Approval Motion are scheduled for April 2, 2024 at 10:30 a.m.

8. Several Objections have been filed to the Approval Motion, including an Objection by the Department of Housing and Urban Development (“HUD”).

9. One of the requirements for the sale is HUD approval of the Successful Bidder, or in the alternative, the backup bidder.

10. In order to permit ANCDI, the Successful Bidder, and 2087 Market Street LLC, the backup bidder, additional time to obtain HUD approval, it is requested that the hearing currently scheduled for April 2, 2024 at 10:30 a.m. be continued until April 30, 2024.

**WHEREFORE**, Debtor, Uptown Partners, LP respectfully requests that this Honorable Court continue the Final Sale Hearing and the hearing on the Motion to Approve Auction Purchaser currently scheduled for April 2, 2024 at 10:30 a.m. to April 30, 2024, and award the Debtor such other and further relief as is just and proper.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

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Date: March 28, 2024